

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10500005-2012**
Application Received: **September 7, 2011**
Plant Identification Number: **03-54-105-00005**
Permittee: **Mustang Survival Mfg, Inc.**
Facility Name: **Elizabeth Plant #2**
Mailing Address: **P. O. Box 520, Elizabeth, WV 26143**

Physical Location:	Elizabeth, Wirt County, West Virginia
UTM Coordinates:	465.36 km Easting • 4323.78 km Northing • Zone 17
Directions:	Located on State Route 14, north of downtown Elizabeth, WV

Facility Description

Mustang Survival Mfg, Inc. is a rubber product manufacturing facility covered by SIC Codes 3069, 2385 and NAICS Codes 31332, 315299. The facility manufactures waterproof and air-tight items such as clothing bags, foul weather wear, and life preservers. Rubber, nylon, or urethane are cut into desired patterns and then sewed and bonded (either by hand, patch press machines, or radio frequency machines). The bonded rubber, nylon, and urethane products are then cured to allow the adhesive to thoroughly dry and ensure that a proper bond has been achieved. Most of the products are allowed to bond by air drying at ambient temperature or by low temperature drying using the drying oven.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	0.14	0.075
Nitrogen Oxides (NO _x)	0.16	0.089
Particulate Matter (PM ₁₀)	0.76	0.039
Total Particulate Matter (TSP)	0.76	0.039
Sulfur Dioxide (SO ₂)	0.001	0.001
Volatile Organic Compounds (VOC)*	82.23	12.057

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2011 Actual Emissions
Toluene	51.07	9.018
Hexane	16.77	2.521
Methanol	1.46	0.174
Diphenylmethane Diisocyanate (MDI)	0.10	0.01
Chlorobenzene	0.10	0.00
Total HAPs**	82.07	11.723

Some of the above HAPs may be counted as PM or VOCs.

*Methyl Ethyl Ketone was delisted by the USEPA as a HAP, but is still included in VOC emissions in the Criteria Pollutants section. VOC PTE includes total HAPs.

** Individual R13-2043 HAP PTE does not include the 11.7 TPY of VOC emissions from Plant #1 Bonding. The HAPs were not speciated in R13-0450, so there were no HAP limits. If all VOC from Plant #1 bonding is assumed to be HAPs, then total HAP PTE for the facility is 82.07 TPY. Total HAP PTE is not based on the sum of the individual HAP PTEs.

Title V Program Applicability Basis

This facility has the potential to emit 51.07 TPY of Toluene and 82.07 TPY of total HAPs. Due to this facility's potential to emit over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Mustang Survival Mfg, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate Emissions from Manufacturing
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permit
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2043C	01/19/2010	
R13-0450	12/29/1978	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were done to the Permit since the most recent modification (R30-10500005-2010):

1. **Permit Shield Table** (Requirement 3.7.2) - added the following line: “45CSR14 - This facility is not a “Major stationary source” as defined in 45CSR§14-2.43, therefore the rule is not applicable.”

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 C.F.R. 60, Subpart Kb - *Standard of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.* Mustang Survival has no storage tanks.

40 C.F.R. 63, Subpart GG - *National Emission Standards for Aerospace Manufacturing and Rework Facilities.* The products produced at Mustang Survival are not defined as an aerospace component/part according to 40 C.F.R. 63.742.

40 C.F.R. 63, Subpart OOOO - *Printing, Coating, and Dyeing of Fabrics and Other Textiles.* The printing operations at Mustang Survival are applied to fabrics and textiles that are distinct and separate pieces of fabrics or textile goods as opposed to a web substrate. A web is defined in Subpart OOOO as a continuous textile substrate which is flexible enough to be wound or unwound as rolls.

40 C.F.R. 64 - *Compliance Assurance Monitoring.* This facility does not have a pollutant-specific emissions unit with a control device to meet an applicable standard or limit. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

45CSR27 - *To Prevent and Control the Emissions of Toxic Air Pollutants.* The facility is not subject to BAT controls because it does not discharge any toxic air pollutant (as defined in 45CSR§27-2.10) into the open air in excess of the amounts shown in Table A of 45CSR27.

45CSR21 - *Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.* Mustang Survival, Inc. is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties.

45CSR14 - This facility is not a “Major stationary source” as defined in 45CSR§14-2.43, therefore they are not subject to the **PSD and Title V Greenhouse Gas Tailoring Rule** requirements.

45CSR§10-4.1 - This facility has the potential to emit less than 500 pounds per year of sulfur oxides. Therefore, it is exempt from this requirement.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: February 1, 2012

Ending Date: March 2, 2012

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.